

Academy Sports and Outdoors, Inc. and its subsidiaries, including Academy, Ltd. (collectively, "Academy," "we," "us" or "our"), are committed to sourcing materials from suppliers that share our values regarding human rights, ethics, and environmental responsibility.

LAW AND GOALS

The "conflict minerals" provisions under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act") require Academy to understand and disclose our use of four metals, gold, columbite-tantalite (tantalum or coltan), cassiterite (tin), and wolframite (tungsten) (or their derivatives, collectively, the "Conflict Minerals"), in the products that we manufacture or contract to manufacture, as well as whether those Conflict Minerals were sourced from the Democratic Republic of Congo or neighboring countries (collectively, the "Covered Countries") and necessary to the functionality or production of a product. Other minerals or derivatives may be identified by Academy as being subject to the requirements of Section 1502 of the Dodd-Frank Act and, therefore, are subject to this Policy. These provisions are designed to help end the violent conflict in the Covered Countries, which has been partially financed by the exploitation and trade of Conflict Minerals originating in the Covered Countries.

Academy supports the Dodd-Frank Act's humanitarian goal of ending the violent conflict in the Covered Countries, enabling transparency in our supplier relationships, establishing responsible supplier relationships, and minimizing the environmental and social footprint of our supply chain. Academy does not purchase Conflict Minerals directly from any source and only purchases finished products from its suppliers. Academy is, therefore, dedicated to only working with those suppliers that share our commitment regarding the sourcing of metals and minerals contained in our products.

OUR CONFLICT MINERALS PROGRAM

Academy will conduct a good faith inquiry annually into the origin of Conflict Minerals that are necessary to the functionality or production of products that we manufacture or contract to manufacture. This inquiry will be reasonably designed to determine whether any such Conflict Minerals originated in the Covered Countries or are from recycled or scrap sources. If Academy has reason to believe that Conflict Minerals may have originated in the Covered Countries, we will perform further due diligence in a manner consistent with the Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas issued by the Organization for Economic Cooperation and Development ("OECD Guidance").

As a publicly traded company, Academy is required to request certain information from its suppliers and report on our inquiries and due diligence to the U.S. Securities and Exchange Commission (the "SEC"). All reports Academy files with the SEC in compliance with applicable Conflict Minerals law will be available to the public through Academy's investor relations website (investors.academy.com). The reports will not contain the names and locations of our suppliers, unless required by law.

EXPECTATIONS OF OUR SUPPLIERS

Academy expects our suppliers to avoid the use of Conflict Minerals that may finance or otherwise benefit armed groups in the Covered Countries. Academy expects our suppliers to have policies in place to conduct reasonable conflict minerals due diligence within their own supply chain that conforms with the OECD Guidance. Academy expects our suppliers to cooperate fully in our Conflict Minerals Program, including by providing complete, accurate, and timely responses to all our inquiries. If a supplier fails to meet our expectations regarding responsible sourcing, we will work with that supplier, including by leveraging industry-standard programs to build capacity for responsible sourcing.

POLICY ADMINISTRATION

The General Counsel has the authority to interpret and enforce this Conflict Minerals Policy. This Policy may be amended, terminated or reinstated at any time at the discretion of the General Counsel. Any questions regarding this Policy should be directed to the Legal Department at Legal-Securities@academy.com.

POLICY VIOLATIONS

Violation or non-compliance of this Policy could result in penalties, up to and including termination of the business relationship. Employees, suppliers, or other interested parties may report known or suspected violations of this policy by emailing ethics@academy.com or by calling 1-888-503-0808.

Last Reviewed Date: 10.25.2024
Owner: Sarah Green, VP Legal
Related Documents: None